

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF AND FACSIMILE

August 25, 2015

The Honorable Frank Maas
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 740
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

I write on behalf of the Plaintiffs' Executive Committees to request a brief extension of the August 31, 2015 deadline for submission of plaintiffs' motion to compel as to defendants Abdullah Omar Naseef, Abdullah bin Saleh al Obaid, Abdullah Muhsen al Turki, and Adnan Basha (the "Charity Official Defendants"). While negotiating the most recent discovery schedule endorsed by this Court (ECF No. 2997), I failed to recognize during my discussions with the Defendants' Executive Committee that I would be traveling during the early part of the week plaintiffs' motion is due. I apologize for not identifying this conflict sooner, and respectfully request that the deadline be extended just a few short days from Monday, August 31st to Wednesday, September 2nd. The extension, if granted, will adjust the remaining deadlines as follows: defendants' oppositions extended to October 7, 2015; plaintiffs' reply briefs extended to October 28, 2015.

Plaintiffs have conferred with counsel for the defendants, and he does not object to the extension.

The Honorable Frank Maas

August 25, 2015

Page 2

The parties thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "J. Scott Tarbutton", is written over the typed name.

J. Scott Tarbutton, Esq.

THE/MDL 1570 PLAINTIFFS' EXECUTIVE
COMMITTEES

JST

cc: MDL-1570 Counsel of Record (via ECF)

LEGAL\24170531\1 00000.0000.000/117430.000